

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

Leonid Falberg, as representative of a class of
similarly situated persons, and on behalf of The
Goldman Sachs 401(k) Plan,

Plaintiff,

v.


The Goldman Sachs Group, Inc., The Goldman
Sachs 401(k) Plan Retirement Committee, and John
Does 1-20,

Defendants.

Case No. 1:19-cv-09910-ER

**PLAINTIFF'S MOTION FOR
LEAVE TO FILE CERTAIN
DOCUMENTS UNDER SEAL**

The application is x granted
_____ denied



Edgardo Ramos, U.S.D.J.

Dated: 11/22/2021

New York, New York

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Section 3(ii) of the Court's Individual Practices, Plaintiff Leonid Falberg ("Plaintiff") hereby moves this Court for an order allowing him to file the following materials under seal in connection with his Motion to Compel Production of Documents Designated as Privileged.

1. An unredacted Reply Memorandum of Law in Support of Plaintiff's Motion to Compel Production of Documents Designated as Privileged (which references material designated as "Confidential" by Defendants);¹
2. Exhibit 1 to the Declaration of Ben Bauer, which contains material designated as confidential by Defendants pursuant to the Protective Order in this action (ECF No. 48).

¹ Plaintiff intends to publicly file a redacted version of the Memorandum that omits references to material designated as "Confidential" by Defendants.

Plaintiff takes no position on whether these materials have been properly designated as confidential by Defendants, and it shall be Defendants' obligation to support this motion as the parties who designated the underlying material "Confidential."

WHEREFORE, subject to Defendants making the necessary showing required by the Court's Standing Order, Plaintiff respectfully requests that this Court enter an order allowing him to file the aforementioned materials under seal in connection with his Motion to Compel Production of Documents Designated as Privileged.

Respectfully Submitted,

Dated: November 19, 2021

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